

1 LAURA E. DUFFY
 United States Attorney
 2 BRUCE C. SMITH
 Assistant U.S. Attorney
 3 California State Bar No. 078225
 Federal Office Building
 4 880 Front Street, Room 6293
 San Diego, California 92101-8893
 5 Telephone: (619) 546-8266
 E-mail: bruce.smith@usdoj.gov

6 Attorneys for Plaintiff
 7 United States of America

8 UNITED STATES DISTRICT COURT
 9 SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,)	Case No. 12cv1029-LAB(WMc)
)	
11 Plaintiff,)	JOINT MOTION FOR
)	JUDGMENT OF FORFEITURE
12 v.)	
)	
13 ONE 2007 CADILLAC ESCALADE,)	
CA LICENSE NO. 6NJA222,)	
14 VIN: 1GYFK63817R296249,)	
ITS TOOLS AND APPURTENANCES,)	
15 Defendant.)	
16)	

17 The United States of America, by and through its attorneys,
 18 Laura E. Duffy, United States Attorney, and Bruce C. Smith, Assistant
 19 U.S. Attorney, and the claimant, Marie Arredondo, and Attorney
 20 Richard M. Barnett, counsel for claimant, stipulate as follows:

21 1. The parties have entered into this stipulation in order to
 22 resolve the matter of the seizure and forfeiture of the defendant
 23 2007 Cadillac Escalade.

24 2. The parties have agreed to a settlement of this matter which
 25 is described as follows:

26 A. On or before July 27, 2012, claimant Marie Arredondo
 27 shall pay to the United States, in the form of a cashier's check, the
 28 full amount of the costs incurred by the United States for the seizure

1 and storage of the defendant 2007 Cadillac Escalade. Upon full and
2 satisfactory payment, the United States shall return the defendant
3 2007 Cadillac Escalade to claimant Marie Arredondo.

4 B. If claimant's payment is made on or before June 28,
5 2012, claimant shall pay to the United States the amount of \$825.46
6 in the form of a cashier's check, made payable to the United States
7 Customs and Border Protection.

8 C. If claimant's payment is made after June 28, 2012, but
9 before July 13, 2012, claimant shall pay to the United States the
10 amount of \$866.71 in the form of a cashier's check, made payable to
11 the United States Customs and Border Protection.

12 D. If claimant's payment is made after July 13, 2012, but
13 before July 27, 2012, claimant shall pay to the United States the
14 amount of \$905.21 in the form of a cashier's check, made payable to
15 the United States Customs and Border Protection.

16 E. Upon receipt of full and satisfactory payment, the
17 United States Customs and Border Protection shall return the defendant
18 2007 Cadillac Escalade to claimant, Marie Arredondo.

19 3. Claimant Marie Arredondo agrees that by entering into this
20 stipulation, she has not "substantially prevailed" within the meaning
21 of Title 28, United States Code, Section 2465.

22 4. The person or persons who made the seizure or the prosecutor
23 shall not be liable to suit or judgment on account of such seizure in
24 accordance with Title 28, United States Code, Section 2465.

25 5. The terms of this settlement do not affect the tax
26 obligations, fines, penalties, or any other monetary obligations
27 claimant Marie Arredondo may owe to the United States.

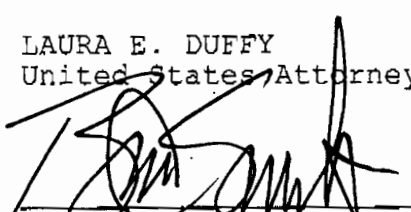
28 6. The parties to this settlement agree that each will bear

1 their own attorney's fees and costs.


2 7. Claimant Marie Arredondo, her agents, employees, or assigns,
3 shall hold and save harmless the United States of America, its agents
4 and employees, from any and all claims which might result from the
5 seizure of one or all of the defendant 2007 Cadillac Escalade.

6
7 LAURA E. DUFFY
United States Attorney

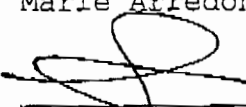
8
9 DATED: JUNE 25, 2012

10 
BRUCE C. SMITH
Assistant U.S. Attorney

11
12 DATED: 6-25-12

13 
RICHARD M. BARNETT
Attorney for Claimant
Marie Arredondo

14
15 DATED: 6.18.12

16 
MARIE ARREDONDO
Claimant